

EXHIBIT D

INDEX IN SUPPORT OF MOTION TO SEAL PORTIONS OF SAVEONSP'S MOTION TO COMPEL JJHCS TO
PRODUCE DOCUMENTS FROM TRIALCARD (ECF NOS. 410, 425, 433, 450 & 464)

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing, if Any, and Basis
<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson regarding status of production of documents from TrialCard, dated October 7, 2024 (ECF No. 410)</u>		JJHCS requests the redaction of information in Exhibit 7 to the October 7 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that this exhibit contains sensitive business information.	<p>If filed on the public docket, these portions of the October 7 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information.</p> <p>Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.</p>	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Exhibit 7	Redactions to discovery letter containing confidential information					

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing, if Any, and Basis
Exhibit 1	<u>Letter from Jeffrey J. Greenbaum to Judge Wolfson regarding status of production of documents from TrialCard, dated October 10, 2024 (ECF No. 464)</u>	JJHCS requests the redaction of information in and exhibits to the October 10 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	If filed on the public docket, these portions of the October 10 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information. Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	Exhibit 1 to Exhibit 1 (the May 28 Letter Order) is redacted consistent with ECF Nos. 307 and 308.	None
	Redactions to exhibits to discovery letters discussing confidential documents					

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing, if Any, and Basis
<u>Letter from E. Evans Wohlforth, Jr. to Judge Wolfson regarding SaveOnSP's Motion to Compel JJHCS to Produce Documents Regarding its CAP Program from its Vendor TrialCard, dated October 25, 2024 (ECF No. 425)</u>		JJHCS requests the redaction of information in and exhibits to the October 25 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	<p>If filed on the public docket, these portions of the October 25 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information.</p> <p>Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its</p>	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Page 7	Redactions discussing confidential exhibits					
Exhibits 1 & 2	Sealing of services agreements containing confidential information					

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing, if Any, and Basis
Exhibit 9	Redactions to subpoena quoting confidential information		competitors secured the information.			
Exhibit 10	Redactions to discovery responses containing confidential information					
Exhibit 11	Redactions to discovery letter discussing confidential documents					

Material/Title of Document		Basis for Sealing (Legitimate Private or Public Interests That Warrant the Relief)	Clearly Defined and Serious Injury That Would Result if Relief Were Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Prior Order Sealing the Same Materials	Party in Opposition to Sealing, if Any, and Basis
<u>Letter from Jeffrey J. Greenbaum to Judge Wolfson in opposition to SaveOnSP's motion to compel, dated November 4, 2024 (ECF No. 433)</u>		JJHCS requests the redaction of information in and exhibits to the November 4 letter that is not known to the general public and which the parties agreed to keep confidential. JJHCS maintains that these documents and exhibits contain sensitive business information.	<p>If filed on the public docket, these portions of the November 4 letter and the exhibits thereto would reveal confidential material relating to JJHCS's sensitive business information.</p> <p>Disclosure to the public of this confidential and proprietary information would cause irreparable harm to JJHCS because it would place JJHCS at a competitive disadvantage if its competitors secured the information.</p>	JJHCS requests the sealing of only the information that will reveal confidential information that is not known to the general public. No less restrictive alternative is available or practicable.	None	None
Exhibits 2, 4 & 6	Redactions to discovery letters discussing confidential documents					